

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

IN RE:

W.R. GRACE & CO., ET AL,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)

Claim No. 2128

**VERIFIED RESPONSE OF THOMAS FRANCIS CAMPEAU TO FOURTEENTH AND  
FIFTEENTH OMNIBUS OBJECTIONS TO ASBESTOS PROPERTY DAMAGE  
SUBSTANTIVE AND NON-SUBSTANTIVE CLAIMS**

NOW COMES Thomas Francis Campeau, In Pro Per, and in response to Debtors' Fourteenth and Fifteenth Omnibus Objections, states as follows:

1. Thomas Francis Campeau resides at 11544 W. County Road, #612, Frederic, Michigan 49733.
2. Plaintiff purchased Zonolite attic insulation on or about November 1, 1970 for installation at his personal residence located at the above address.
3. Since the installation of the referenced asbestos containing attic insulation, it has remained undisrupted in Claimant's attic.
4. At the time of Claimant's purchase of said Zonolite attic insulation from Dubois Lumber Company, formerly located in Grayling, Michigan, Claimant received a receipt(s) which, after approximately 35 years, cannot now be located. Dubois Lumber Company is no longer in business and its owner, Richard DuBois, is deceased.
5. As a result of the presence of asbestos containing insulation in Claimant's residence, Claimant and his family and guests have been exposed to asbestos containing materials for approximately 35 years.

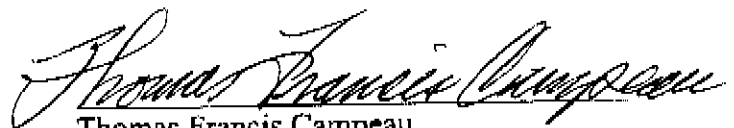
6. Claimant has no ability, financially or otherwise, to remove said asbestos containing attic insulation from his personal residence nor to sample said insulation or measure relevant asbestos levels in his home.

7. Claimant's claims are not barred by any applicable statute of limitation or laches as a result of the continuing exposure of Claimant and his family and guests to said asbestos contained material

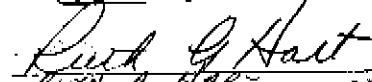
8. Claimant ultimately seeks to compel Debtors and/or their representatives to remove and replace said asbestos containing attic insulation with non-asbestos attic insulation at Debtors' cost and expense.

WHEREFORE, Claimant requests this Court to dismiss Debtors' Fourteenth and Fifteenth Omnibus Objections to his claim and grant to Claimant such further relief as this Court deems appropriate.

Dated: October 2<sup>RD</sup>, 2005

  
Thomas Francis Campeau

Subscribed and sworn to before me  
this 3<sup>RD</sup> day of October, 2005.

  
RUTH A. HART Notary Public  
CRAWFORD County, Michigan  
My Commission Expires: 8/27/2011  
ACTING IN CRAWFORD COUNTY

RUTH A. HART  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF CRAWFORD  
MY COMMISSION EXPIRES Aug 27, 2011  
ACTING IN COUNTY OF CRAWFORD

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